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6 Attorneys for Defendants

7 Chase Home Finance, LLC (on behalf of itself and as successor
in interest to Chase Manhattan Mortgage Corporation) and

8 James Boudreau

9 UNITED STATES DISTRICT COURT

10 SOUTHERN DISTRICT OF CALIFORNIA

11
12 CHRISTOPHER CLARK and JAMES
13 RENICK, individuals,

14 Plaintiffs,

15 v.

16 CHASE HOME FINANCE, LLC; a Delaware
LLC doing business in California; CHASE
17 MANHATTAN MORTGAGE
CORPORATION, a New Jersey corporation
18 doing business in California; JAMES
BOUDREAU, an individual; and DOES 1-25,

19 Defendants.
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Case No. 08 CV 0500 JM RBB

**DECLARATION OF JAMES
BOUDREAU IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO
REMAND TO STATE COURT**

Date: May 16, 2008

Time: 1:30 p.m.

Courtroom: 16

1 I, James Boudreau, hereby declare:

2 1. I am an Applications Developer and a current employee of JP Morgan Chase
3 Bank. I am also an individually named defendant in this case. I make this declaration in support
4 of Defendants' Opposition To Plaintiffs' Motion To Remand To State Court. The facts set forth
5 in this declaration I know to be true of my own personal knowledge, except where such facts are
6 stated to be based on information and belief, and those facts I believe to be true. If called as a
7 witness I could and would testify competently to the matters set forth in this declaration.

8 2. I am not (and never have been) a corporate officer or director of Chase Home
9 Finance, LLC, or of Chase Home Mortgage Corporation when that company was in existence.

10 3. During the time that Plaintiffs Christopher Clark and James Renick worked for
11 Chase Home Mortgage Corporation and Chase Home Finance, LLC, I was not their employer. I
12 did not have decision-making responsibility for the compensation policies that governed their
13 employment, nor the determination as to whether or not they were considered exempt employees.

14 4. I am not, and have never been, the alter-ego of Chase Home Mortgage Corporation
15 or Chase Home Finance, LLC. I have never had any commingled funds or other assets with
16 either Company. I have never taken on liability for the debts of Chase Home Mortgage
17 Corporation or Chase Home Finance, LLC, and those companies have never taken on liability for
18 my debts. I am not, and have never been, the equitable owner of Chase Home Mortgage
19 Corporation or Chase Home Finance, LLC.

20 5. Although I was an employee of Chase Home Finance, LLC, and of Chase Home
21 Mortgage Corporation when that company was in existence, I personally have never employed
22 any of the employees of either Company. I also do not have, and have never had, any of my own
23 personal officers or directors.

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